UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

J.D., on behalf of herself and others similarly situated, <i>et al.</i> ,)))
Plaintiffs,))) No. 17-cv-02122-TSC
V.)
ALEX M. AZAR, et al.,))
Defendants.))

GOVERNMENT'S UNOPPOSED MOTION FOR EXTENSION

Defendants respectfully move this Court for an extension of time within which to file its response to Plaintiffs' Motion for Preliminary Injunction, ECF No. 144. Defendants conferred with Plaintiffs' counsel on August 26, 2019, and Plaintiffs' counsel consent to the filing of this motion.

Defendants request an extension of thirty (30) days, until September 30, 2019, within which to file the response. The parties have further agreed to an extension of time for the Plaintiffs' reply in support of their motion of fourteen (14) days, until October 30, 2019. Finally, Defendants request that the Court allow the parties to extend the deadlines for their status reports from September 4, 2019, to October 13, 2019, and from September 18, 2019, to November 4, 2019.

Defendants agree to continue to abide by the portion of the Joint Stipulation stating that

Defendants (along with their respective successors in office, officers, agents, servants,

employees, attorneys, and anyone acting in concert with them) will continue to act in accordance

with paragraph 2 of this Court's April 16, 2018 Amended Class Certification and Preliminary Injunction Order, ECF No. 136, until 45 days after briefing is completed.

A proposed order is attached.

August 27, 2019

Respectfully submitted,

/s/ Christina P. Greer Christina P. Greer Trial Attorney

W. Daniel Shieh Sabatino F. Leo Senior Litigation Counsels

Michael C. Heyse Trial Attorney Office of Immigration Litigation Civil Division, U.S. Department of Justice P.O. Box 878, Ben Franklin Station Washington, D.C. 20044 Phone: (202) 598-8770 Fax: (202) 616-4975

Christina.P.Greer@usdoj.gov

Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on August 27, 2019, I electronically filed the foregoing document with the Clerk of the Court for the United States District Court for the District of Columbia by using the CM/ECF system. Counsel in the case are registered CM/ECF users and service will be accomplished by the CM/ECF system.

By: /s/ Christina P. Greer

CHRISTINA P. GREER

Trial Attorney

United States Department of Justice

Civil Division

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF COLUMBIA

J.D., on behalf of herself and others similarly situated, <i>et al.</i> ,)))
Plaintiffs,))) No. 17-cv-02122-TSC
v.)
ALEX M. AZAR, et al.,))
Defendants.)))

[PROPOSED] ORDER ON GOVERNMENT'S UNOPPOSED MOTION

Upon consideration of the Government's Unopposed Motion for Extension, and in recognition of Defendants' agreement to continue to abide by Section 2 of this Court's April 16, 2018 Amended Class Certification and Preliminary Injunction Order, ECF No. 136, until 45 days after completion of the briefing of Plaintiffs' Motion for Preliminary Injunction, ECF No. 144, it is hereby

ORDERED that Defendants' opposition to Plaintiffs' Motion for Preliminary Injunction, ECF No. 144, is due September 30, 2019. Plaintiffs' reply in further support of their Motion for Preliminary Injunction is due October 30, 2019; and it is further

ORDERED that the parties will meet and confer and file status reports on October 13, 2019, and November 4, 2019, as to factual disputes by affiants, and whether an evidentiary hearing is needed, and if so, how the parties propose proceeding at such a hearing.

Dated: August, 2019	
	Tanya S. Chutkan
	United States District Judge